

Rocky Flats Environmental Technology Site

1-C91-EPR-SW.01

REVISION 3

CONTROL AND DISPOSITION OF INCIDENTAL WATERS

APPROVED BY *Alec Cameron* / *Alec Cameron* / *6-27-03*
Alec Cameron, Print Name Date
Kaiser-Hill Site Services

Responsible Organization RFCSS-Surface Water Operations
Effective Date July 1, 2003

USE CATEGORY 4

XX

ISR review is not required

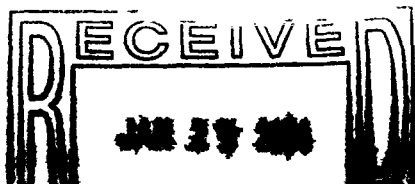
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Concurrence by the following disciplines is documented on the document history file

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Date _____

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1 PURPOSE

To protect water quality in streams and local waterways and to meet the National Pollutant Discharge Elimination System (NPDES) Permit and other regulatory requirements, this procedure provides for the control and disposition of incidental waters originating from the following Rocky Flats Environmental Technology Site (RFETS) sources and activities

- Construction activities that require excavation below the ground water table and subsequent ground water pumping
- Natural collection and subsequent pumping of precipitation and storm water runoff in excavations, pits, trenches, ditches, or depressions
- Collection of water in secondary containments, process waste valve vaults, electrical vaults, or manholes that require pumping.
- Discharge of water from the fire suppression system when the system has been breached inside a Radiological Buffer Area or Contamination Area.
- Other sources of water requiring disposal or management.

NOTE *The procedure Environmental Controls on Incidental Sprinkler Water Discharge, 4-W85-FS-1206, is utilized to direct the control and disposition of fire suppression system water discharges during routine system testing and maintenance. This procedure is adequate to address Surface Water concerns and no further exemption requests are required, provided the system has not been breached within a Radiological Buffer Area or a Contamination Area.*

Waters that originate from a potable water source or from precipitation events and are collected in areas that have no potential for contamination may be provided a written exemption. Areas with the potential for contamination include Individual Hazardous Substance Sites (IHSS), material and waste storage or handling areas, and high traffic areas.

For each incidental water, consideration will be given to treatment versus sampling and analysis and/or evaluation for discharge to the ground or storm sewer system when determining the appropriate disposition. This decision will be based primarily on the characteristics of the water. However, practical considerations such as costs of sampling, analysis, and transportation, availability of transportation, capacity of treatment facilities, and project delays may also be considered.

2 OVERVIEW

The effective operation of the RFETS involves various water management activities that may result in incidental waters (also termed "non-storm waters" by the RFETS NPDES

Permit) requiring on site treatment or discharge to storm drains or the ground. Incidental waters may originate as precipitation, surface water, ground water, utility water, process water, or wastewater. Such waters have the potential of contacting contaminants present at concentrations exceeding acceptable levels. Such levels are based on those prescribed in one or more of the following: Colorado State Water Quality Standards, the RFETS NPDES Permit, the Rocky Flats Cleanup Agreement (RFCA, specifically, Attachment 5), and applicable or relevant and appropriate requirements defined by the U.S. Environmental Protection Agency or other regulatory agencies. The RFETS NPDES Permit provides specific limitations on the discharge of incidental waters to the RFETS Wastewater Treatment Plant (WWTP).

This procedure ensures that water originating from the activities and sources identified in Section 1, is properly controlled, contained, sampled and analyzed (if required), evaluated, and treated or discharged. This procedure is in agreement with the requirements of the RFETS NPDES Permit (CO-0001333, October, 2000) for the control and disposition of incidental waters.

3 DEFINITIONS

Incidental Water Precipitation, surface water, ground water, utility water, process water, or wastewater collecting in one or more of the following areas:

- Excavation sites, pits, or trenches
- Secondary containments or berms
- Valve vaults
- Electrical vaults
- Steam pits and other utility pits
- Utility manholes
- Other natural or manmade depressions which must be de-watered
- Discharges from a fire suppression system which has been breached within a Radiological Buffer Area or a Contamination Area

4 LIMITATIONS AND PRECAUTIONS

Incidental water samples may be collected in radiological areas or confined spaces. Before entering such an area, the Sampling Crew shall ensure that a Radiation Work Permit (RWP), Beryllium Work Form (BWF) and/or Confined Space Entry Permit, if required and appropriate, have been obtained for the area. The Sampling Crew shall be responsible for

following all requirements of the permit, including donning specified Personal Protective Equipment (PPE). All members of the Sampling Crew entering the area shall have successfully completed any required training

Incidental waters will be evaluated or characterized using process knowledge, to the extent practical, prior to sampling. If the incidental water is suspected of having a potentially significant concentration of a contaminant(s), the Sampling Crew will be informed by Surface Water Operations of the potential hazards and the appropriate precautionary actions

If during the sampling of an incidental water, the Sampling Crew encounters hazardous conditions which had not previously been identified and addressed via JHA controls, the Sampling Crew SHALL stop work and immediately notify supervision and Surface Water Operations, and area management, if appropriate.

5 PREREQUISITE ACTIONS

None

6 RESPONSIBILITIES AND TRAINING

Responsible Program Managers/Managers described in this procedure must ensure all personnel are appropriately trained and qualified to perform the duties and responsibilities of assigned tasks

6.1 Activity Coordinators

Contact the Surface Water Operations (SWOps) group when incidental water as described in Section 1, is encountered.

6.2 Activity Supervisors

- [A] Contact SWOps when an activity (e.g., construction) causes or results in the accumulation of water in an excavation area that needs to be managed
- [B] Contact SWOps before the start of an excavation activity in which water requiring removal or management is *likely* to be encountered

6.3 Analysis Laboratory

NOTE *The Analysis Laboratory is determined by Analytical Services Division*

Perform requested water analyses

6 4 Emergency Services

Collect incidental water from fire suppression systems in appropriate containers/vessels to facilitate accurate sampling and analysis, when collection is required

6 5 Trucking Operations

Provide equipment, vehicles and labor as necessary, to pump, contain, and transport incidental waters for treatment or disposal

6 6 Industrial Wastewater Operations

Ensure that the following activities are performed as necessary

- Obtain, transport, and deploy the necessary equipment to the field site
- Pump incidental water to a containment vessel
- Transfer incidental water to appropriate treatment facility

6 7 ASD Analytical Support Services Crew

Obtain required water samples as directed by Surface Water Operations

6 8 Surface Water Operations

Determine whether the incidental water should be sent for treatment, or sampled and analyzed and/or evaluated for possible discharge to the ground

If treatment of the incidental water is cost effective, practical and compatible with acceptance criteria, contact the Facility Manager of the appropriate treatment facility to coordinate transportation or discharge of the incidental water

If the incidental water is to be sampled, determine appropriate sampling parameter requirements, receive and interpret test results and/or analytical results Make decision on and obtain approvals for the disposition of the incidental water

Document the decision in the IW database and maintain database to track all of the IW control activities, including pumping, containment, sampling, analytical results, transfers, storage, and final disposition - (treatment or discharge)

Maintain hardcopy files and database for the control and disposition of incidental waters

7 INSTRUCTIONS

7 1 Identification of Incidental Waters

Identifying Individual

- [1] Notify immediate supervisor upon identification of a potentially new source of incidental water which requires control and disposition

NOTE *The SWOps contact made in Step 7 1 [2] should be made before the start of any new excavation work, if possible*

Activity Coordinator or Supervisor

- [2] Contact Surface Water Operations, and submit an Incidental Water Discharge Request Form (Appendix 3) for the new incidental water
- [A] Provide any pertinent information available that may enhance SWOps ability to evaluate IW water quality and/or determine the status of the new water, including location, volume, suspected contaminants, and relevant historical information.

Surface Water Operations

- [3] Gather information about the water source, including a walk-down of the field site, as practicable
- [4] Determine whether direct transfer of the water to a treatment facility is appropriate and practicable based on the following criteria
- [A] If the incidental water can be adequately characterized utilizing historical and process knowledge, determine the appropriate treatment facility and obtain acceptance from the treatment facility manager without sampling and analysis of the water

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- [B] The appropriate treatment facility has adequate storage and treatment capacity for the incidental water
 - [C] The necessary equipment and/or vehicles can be obtained in a timely manner (i.e., without delaying operations beyond the expected delay for sampling and analysis) to allow transfer of the incidental water
- [5] **IF** all of the criteria in 7.1 [4] can be met,
THEN
- [A] Coordinate the transfer and treatment of the incidental water with the appropriate treatment facility
 - [B] Exit this procedure
- [6] **IF** one or more of the criteria in 7.1 [4] cannot be met,
THEN complete the Identification section of the Incidental Water Identification and Control Form (IWIC) found in the Incidental Waters Database

NOTE SWOps maintains a database with all IWIC Form entries, including the IW tracking numbers assigned.

- [A] Assign the next available sequential IWIC number using the following format**

IW-YYXXX	Where	IW	=	Incidental Water
		YY	=	Last two digits of the Fiscal Year
		XXX	=	Sequential number

- [8] **IF** it is suspected that the water source may be exempt from the control requirements of this procedure,
THEN determine if the water source is exempt from this procedure by completing the Incidental Water Control Exemption Request (IWCER) found in the Incidental Waters Database (see Appendix 1)

Examples of situations where an exemption may be appropriate include the following

- [A] Waters that originate (1) from a potable water source or (2) from precipitation events and are collected in areas that have no potential for contamination
- [B] Precipitation collected in secondary containment structures for RCRA storage areas, provided that daily inspection for leaks or spills are

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performed and documented, and that any leaks or spills have been remediated.

- [9] IF the water source is exempt from the requirements of this procedure, THEN
- [A] Notify the affected activity coordinator or supervisor
 - [B] Notify the organization responsible for the affected area or system, if different from the IWIC initiator's organization
 - [C] Ensure that any special conditions or requirements specified on the IWCER are met.
 - [D] Ensure disposition of the IWCER and all attachments are in accordance with Section 9, Records
 - [E] Exit this procedure
- [10] Determine the appropriate list of sample parameters necessary to characterize the incidental water. There is not a predetermined set of sample parameters for which each incidental water event must be sampled. It is the responsibility of Surface Water Operations to determine what minimal parameters are adequate and appropriate to properly characterize the incidental water. This determination should be made by identifying potential contaminant sources, utilizing resources such as the *Historical Release Report*, past sampling results, and process knowledge. Consultation with treatment facility managers may be advised for new sources to adequately characterize water prior to treatment. In the case of incidental water within secondary containment, it may be necessary to sample for the material stored in the primary containment.
- NOTE.** *The IW database provides access to historical information and process knowledge that can be useful in evaluating these waters*
- [11] Notify the appropriate sampling crew of the need to sample the incidental water, and complete the Sampling section of the IWIC Form in the database
- [12] Notify the initiating organization of the status of the incidental water if containment or monitoring requirements exist
- [13] Record any additional comments on the IWIC Form in the database, as appropriate
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7 2 Monitoring, Containment, and Collection of Incidental Waters

Surface Water Operations

- [1] Coordinate with the initiating organization and ensure that Steps 7 2 [2] through 7 2 [5] are performed, as applicable

Activity Coordinator or Supervisor

- [2] Perform required containment and/or monitoring of the affected area or system in accordance with the instructions provided by Surface Water Operations
- [3] IF desire to minimize excessive delays in work activities,
THEN pump incidental waters to a Surface Water Operations-approved containment vessel for temporary holding until sampling and analysis can be completed, and the proper method of disposal can be determined

Fire Department

- [4] IF a fire suppression system is considered exempt, as indicated in 7 1 [8],
AND there is no potential for contamination of the water,
THEN discharge the fire suppression system to the ground to support testing and maintenance, as appropriate
- [5] IF a fire suppression system is NOT considered exempt, as determined in 7 1 [8],
OR there is a potential for contamination of the water,
THEN pump incidental waters to a SWOps-approved containment vessel for holding until sampling and analysis can be completed, and the proper method of disposal can be determined

7 3 Sampling of Incidental Waters

Activity Coordinator or Supervisor

- [1] Coordinate with SWOps to ensure that the following water is independently sampled and analyzed to determine suitability for discharge
- Excavation sites, pits, or trenches
 - Secondary containments or berms
 - Valve vaults
 - Electrical vaults

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- Steam pits and other utility pits
- Other natural or manmade depressions which must be de-watered
- Any other source of water requiring disposition.

Surface Water Operations

- [2] Assist the designated sampling crew with the sampling of the incidental water, as necessary
- [3] IF the activity or source of the incidental water is in or near an area of known or suspected contamination [such as a RCRA Storage Unit or an IHSS or groundwater plume area], or in an area of unknown history, THEN determine if samples to support additional chemical analyses need to be collected

In this case, the analyses may be performed by an RFETS-approved contract laboratory

Analytical Services Division

- [4] Dispatch a sampling crew upon request by SWOps to perform field tests and collect requested incidental water samples
- [5] Prepare the incidental water samples in accordance with procedure ASD-003, *Identification System for Reports and Samples* or ST-ASI4-SOP001, *Waste Characterization Sampling* as appropriate. Ensure that representative samples are collected for the analytes specified by SWOps
- [6] Transport the samples to one of the following laboratories, as appropriate, in accordance with applicable chain-of-custody and transportation requirements for such materials
- General Laboratory (On-site Laboratory)
 - Canberra Mobile Lab Services (CMLS)
 - ASD designated offsite laboratory if needed analyses are beyond the normal capabilities of the General Laboratory or CMLS

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7 4 Analysis of Incidental Water Samples

Analytical Services Division

- [1] Ensure that incidental water samples are analyzed by qualified and approved laboratories for the parameters specified by SWOps, and utilizing appropriate standard methods and/or procedures
- [2] **IF** the activity or source of the incidental water is an area of known or suspected contamination (such as in or near a RCRA Storage Unit or an IHSS), or in an area of unknown history,
THEN contact SWOps to determine if additional chemical analyses should be performed for specific known or likely water quality parameters

In this case, the analysis may need to be performed by an RFETS-approved contract laboratory

- [3] Promptly forward a copy of the incidental water sample analysis results to SWOps and to the activity coordinator or supervisor

Surface Water Operations

- [4] Receive and interpret analytical results from the laboratory(ies), referring to the control limits summarized in the following table and any other standards or control limits established by Surface Water Operations, or by permit, agreement, or regulation, as applicable

Table 1 Water Quality Parameter Control Limits

Parameter	Limit
pH	6.5 - 9.0
Nitrates as N	10 mg/L
Conductivity	0.700 mS/cm
Gross Alpha	40 pCi/L
Gross Beta	50 pCi/L

Any incidental water that exceeds the control limit for any parameter in Table 1,

OR

exceeds any other control limit established by regulation or by Surface Water Operations, shall be contained, and may NOT be discharged directly to the environment

- [5] **IF** the sample analyses results are NOT within established limits,
AND there is reason to suspect that either the sample may be un-representative or the analyses have failed QA/QC ,

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THEN arrange for re-sampling and/or reanalysis, if necessary

- [6] **IF** further characterization of the incidental water is warranted,
THEN

[A] Request through ASD that the appropriate laboratory perform additional analyses

[B] Document any additional sampling parameter requirements on the IWIC Form in the database

- [7] Complete the "Results" section of the IWIC Form in the database

- [8] **IF** analyses of the incidental water indicate concentrations of constituents that exceed Resource Conservation & Recovery Act (RCRA) regulated limits,
THEN

[A] Notify the appropriate Environmental Program Manager/Environmental Technical Advisor that the water may be a hazardous waste

- [9] Determine the appropriate disposition of incidental water, and complete the "Disposition" section of the IWIC Form in the database

IF the incidental water CANNOT be discharged to the environment,
THEN determine the appropriate treatment facility (i.e., AWTs, Wastewater Treatment Plant, Building 891 Consolidated Water Treatment Facility) based upon the characteristics of the incidental water and the facility acceptance criteria. Contact the Operations/Facility Manager of the treatment facility to discuss concurrence

7.5 Disposition of Incidental Waters

NOTE *The affected activity coordinator or supervisor, with assistance from the Trucking Operations if needed, is responsible for discharging approved incidental water directly to the environment (that is, to the storm drain or to the ground)*

Surface Water Operations

- [1] Contact the activity coordinator or supervisor to advise on the disposition of the incidental water in an appropriate manner (i.e., preferred discharge location and rate) depending on the analytical results

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- [2] Provide activity coordinator or supervisor with a copy of the Incidental Water Report (see Appendix 2), which includes analytical results and disposition requirements
- [3] File original copy of the IW Report in the current Surface Water Operations IW binder

Activity Coordinator or Supervisor

- [4] **IF** the incidental water **IS APPROVED** to be discharged directly to the environment,
THEN
 - [A] Contact Trucking Operations and Industrial Wastewater Operations for assistance in performing Steps 7 5 [4][B] and 7 5 [4][C], as necessary
 - [B] Obtain and transport the necessary equipment to the field site
 - [C] Discharge the incidental water to the storm drain or to the ground, at the location and rate directed by SWOps
- [5] **IF** the incidental water **IS NOT APPROVED** to be discharged to the environment,
THEN contact the designated treatment facility manager (see Section 7 4 [9])

Industrial Wastewater Operations

- [6] **IF** the incidental water **IS NOT APPROVED** to be discharged to the environment,
THEN
 - [A] Coordinate with Trucking Operations, as required, to obtain and transport the necessary equipment to the field site
 - [B] Pump the incidental water to a containment vessel(s)
 - [C] Transfer the water to the location specified in the completed IW Report
- [7] Retain a hard copy of the completed IW Report

7 6 Termination of an Incidental Water Control Exemption

Surface Water Operations

- [1] **IF** a water source was previously determined to be exempt from treatment,

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AND SWOps has determined a need to terminate the exemption prior to the expiration date,
THEN

- [A] Notify the organization responsible for the affected area or system to terminate the exemption This notification may be made by telephone.
 - [a] Document this notification in a memorandum, and forward a copy to the organization responsible for the affected area or system
- [B] Process a new IWIC Form and IWCER as if a water source was a new source in accordance with this procedure

8 POST-PERFORMANCE ACTIVITY

- [A] Once the incidental water is discharged, remove any containment monitoring
- [B] Upon completion of activities required by this procedure, closeout any Radiation Work Permits or Confined Space Entry Permits that were required

9 DISPOSITION OF RECORDS

Surface Water Operations

- [1] Ensure that all of the incidental water control activities are properly documented in the IW Database
- [2] Maintain hard copies of the IW Reports and IWCERs in accordance with 1-V41-RM-001, *Record Management Guidance for Records Sources*

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10 REFERENCES

1-V41-RM-001, *Record Management Manual Rev 2*, Rocky Flats Environmental Technology Site, Golden, Colorado, 12/31/2001

IA IM/IRA, *Final Interim Measures/Interim Remedial Action Decision Document for Rocky Flats Industrial Area*, Rocky Flats Environmental Technology Site, Golden, Colorado, November 1994

4-W85-FSS-1206, *Environmental Controls on Sprinkler Water Discharges*

ASD-003, *Identification System for Reports and Samples*

ST-ASI4-SOP001, *Waste Characterization Sampling*

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Appendix 1

Incidental Water Exemption Request Form

IW NUMBER DATE
CUSTOMER NAME

Water Identification

LOCATION (BLDG) VOLUME (Gal)
LOCATION TYPE
LOCATION DESCRIPTION

Preliminary Evaluation

- 1 Does water originate from a drinking water source or from precipitation events in areas that have no possibility of contamination? ☐ YES ☐ NO
2 Is the water source free of any credible potential of being contaminated? ☐ YES ☐ NO

NOTES [A] IF either question above is answered NO THEN the incidental water may NOT be exempted from Procedure 1-C91-EPR-SW 01
[B] IF both questions above are answered YES THEN the incidental water may be exempted from Procedure 1-C91-EPR-SW 01 Any restrictions specified below must be adhered to in order to maintain this Exemption

Disposition

EXEMPTION APPROVED ☐ YES EXEMPTION DENIED ☐ YES
EXEMPTION APPROVAL PERIOD: Start Date Expiration Date

RESTRICTIONS Notify SWOps (x4985) if any of the following occur

- ☐ IF a spill/release occurs within or at the building, THEN immediately stop discharging the incidental water
☐ IF operational activities or structural configuration changes occur within or at the discharging building This includes transfer of the building for decommissioning and demolition activities.
☐ IF the incidental water no longer needs to be discharged
☐ OTHER. _____

NOTE: Customer is responsible for contacting SWOps (x4985) if another Exemption is needed after this Exemption expires.

I certify that this form was prepared in accordance with Procedure 1-C91-EPR-SW 01 The information submitted is, to the best of my knowledge true, accurate, and complete

SWOps Preparer / Date

SWOps Reviewer / Date

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Appendix 2

INCIDENTAL WATER REPORT

CUSTOMER NAME	<input type="text"/>	EXT	<input type="text"/>
ORGANIZATION	<input type="text"/>	PAGER	<input type="text"/>
BLDG	<input type="text"/>	VOLUME (gal)	<input type="text"/>

Identification

LOCATION (BLDG)	<input type="text"/>	IWIC NO	<input type="text"/>
LOCATION TYPE	<input type="text"/>	DATE	<input type="text"/>
LOCATION DESCRIPTION <input type="text"/>			

☒ EXEMPT?

If YES then the water is exempt from the requirements of Procedure 1-C91
EPR-SW 01 See attached Incidental Water Control Exemption Request

Results

pH	<input type="text"/>	Acceptable Range 6.5 to 9.0*
NO3 as N (mg/L)	<input type="text"/>	Not to Exceed 10 mg/L*
CONDUCTIVITY (mS/cm)	<input type="text"/>	Not to Exceed 0 700 mS/cm*
GROSS ALPHA (pCi/L)	<input type="text"/>	Not to Exceed 40 pCi/L*
GROSS BETA (pCi/L)	<input type="text"/>	Not to Exceed 50 pCi/L*
OTHER CONTAMINANTS	<input type="text"/>	
EVALUATION OF DATA	<input type="text"/>	

*Limits based on Colorado Water Quality Stream Standards/Best Management Practices

Disposition

METHOD OF DISPOSAL	<input type="text"/>	START DATE	<input type="text"/>
DESTINATION	<input type="text"/>	END DATE	<input type="text"/>
COMMENTS	<input type="text"/>		

I certify that this document was prepared in accordance with Procedure 1-C91-EPR-SW 01
The information submitted is, to the best of my knowledge, true, accurate, and complete.

Surface Water Preparer / Date

Surface Water Reviewer / Date

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Appendix 3

INCIDENTAL WATER DISCHARGE REQUEST FORM

SECTION 1 WATER IDENTIFICATION (to be completed by Requester)					
Building		Room/Tank/Manhole		Estimated Volume	
Drums		WEMS Numbers		Charge Number	
Does water have oil sheen? <input type="checkbox"/> Yes <input type="checkbox"/> No		Appearance/Color		Solids Present? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Is water in Rad Area? <input type="checkbox"/> Yes <input type="checkbox"/> No		Area Posting			
Suspected Contaminants/Pollutants (Include MSDS)			Known Contaminants/Pollutants		
List type of water discharge location etc					
Requested Discharge Dates Start Date			End Date		
List special safety requirements (POD RWP RCT Support, PPE, etc.) for Sampling Team entry					
To the best of my knowledge the above Incidental Water is fully properly and truthfully described and identified					
Requester (Print Name)		Signature & Date		Extension Pager Fax Company	
SECTION 2 SAMPLING RESULTS & DISPOSITION (to be completed by Surface Water Operations)					
Test		Sampling Results		Limits	
pH				8.5 to 9.0	
NO ₃ as N (mg/L)				Not to Exceed 10 mg/L	
Conductivity (mS/cm)				Not to Exceed 0.700 mS/cm	
Gross Alpha (pCi/L)				Not to Exceed 40 pCi/L	
Gross Beta (pCi/L)				Not to Exceed 50 pCi/L	
Metal Screen					
Volatile Organics Analysis					
Method of Disposal		<input type="checkbox"/> To Ground or Storm Drain		<input type="checkbox"/> Building 895 (WWTP) <input type="checkbox"/> Building 891 (CWTF)	
Discharge Start Date		Discharge End Date		IW#:	
Exemption Request		<input type="checkbox"/> Approved <input type="checkbox"/> Denied		<input type="checkbox"/> N/A	
Comments or Restrictions					
Surface Water Operations Preparer			Date		
Surface Water Operations Reviewer			Date		
WWTP Supervisor/Manager			Date		
CWTF Facility Manager			Date		
SECTION 3. DISCHARGE CERTIFICATION (to be completed by Requester)					
Volume (if different than estimated in Section 1)					
Date discharge was completed					
Comments (any changes or abnormalities from Sections 1 or 2)					
I certify the Incidental Water described above was discharged as per the instructions in Section 2 and no additional water chemicals or known contaminants were added to the water prior to the discharge					
Requester (Print Name)		Signature & Date		Extension Pager Fax Company	

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